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September 29, 2022

Via ECF:

The Honorable Mary Kay Vyskocil, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007-1312

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Re: **Cashabamba v. USA Interiors LLC et al.**
Civil Docket No.: 22-cv-03337 (MKV)

Dear Judge Vyskocil:

Our office represents Plaintiff in the above-referenced matter, and we respectfully submit this letter motion to request an adjournment of the parties' Initial Pretrial Conference on Tuesday, October 11, at 12:30 PM, in Courtroom 18C of the Daniel Patrick Moynihan Courthouse.

As a preliminary matter, Defendants' counsel has consented to this request, and this is the second such request made for an adjournment of the parties' Initial Pretrial Conference.

On September 16, 2022, we wrote to apprise the Court, *inter alia*, that: "Our office will be closed on September 27, 2022 in observance of Rosh Hashanah. As such, we respectfully request that the Court adjourn the parties' Initial Pretrial Conference until a date convenient for the Court in October 2022. The parties have conferred and can propose the following dates: October 12, 2022 and October 13, 2022, should any suit the Court's availability." *See* Dkt. No. 14.

In response thereto, the Court granted the parties' request for an adjournment and rescheduled their Initial Pretrial Conference to Tuesday, October 11 at 12:30 PM. *See* Dkt. No. 15. The reason the instant adjournment request is made, is that our office will be closed on October 11, 2022, in observance of the holiday of "Sukkoth." To that end, in addition to October 11, our office will also be closed on October 17, and on October 18, in observance of religious holidays during this season.

As such, we respectfully request that the Court adjourn the parties' Initial Pretrial Conference until a date convenient for the Court in October 2022, other than, on:

- October 11, October 17, or October 18 (Plaintiffs unavailable due to religious holidays); or
- October 25, October 26, or October 27 (Defendants unavailable due to a pending Arbitration)

As asserted above, this is the second request for an adjournment of the Initial Pretrial Conference and this request would only affect the date by which the parties are to submit the Proposed Case Management Plan and Scheduling Order, and joint letter, which are to be provided one week before the conference.

In the meantime, the parties will continue with discovery pursuant to Federal Rule of Civil Procedure 26.

We thank the Court for its kind consideration on this matter, and we remain available to provide any additional information.

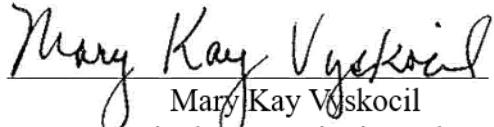
Respectfully submitted,

Roman Avshalumov
Roman Avshalumov, Esq.

CC: Counsel of record for Defendants via ECF & Electronic Mail.

The request for an adjournment is GRANTED. The Initial Pretrial Conference is rescheduled for Wednesday, November 2 at 4:00 PM in Courtroom 18C of the Daniel Patrick Moynihan Courthouse. The parties should continue with discovery pursuant to Federal Rule of Civil Procedure 26. SO ORDERED.

Date: 9/29/2022
New York, New York


Mary Kay Vyskocil
United States District Judge